United States Court of Appeals

for the Second Circuit

AMICUS BRIEF

Nos.

76-6049, 6050, 6059

IN THE UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

CITY OF HARTFORD, ET AL.,

Plaintiffs-Appellees,

v.

TOWNS OF GLASTONBURY, WEST HARTFORD,
and EAST HARTFORD,

Defendants-Appellants,

and

PATRICIA R. HARRIS, SECRETARY OF HOUSING
AND URBAN DEVELOPMENT, ET AL.,

Defendants.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

SUPPLEMENTAL BRIEF FOR THE SECRETARY OF HOUSING AND URBAN DEVELOPMENT AMICUS CURIAE ON REHEARING EN BANC

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I.

INTRODUCTION

This memorandum is submitted in response to the Court's request that the parties address three questions to assist in the en banc reconsideration of the decision by the three-judge panel. These questions are:

1. Have the appellant Towns satisfied the "expected to reside" requirement for fiscal 1975?

2. If so, have the appellant Towns reapplied to the lower court for modification of the decree as set forth at page 1105 of the panel majority opinion?

3. If not, what has happened to the funds in question?

In accord with this Court's invitation to discuss other issues, this memorandum will also discuss the standing issue. 1/

II.

RESPONSES TO QUESTIONS

1. Have the appellant Towns satisfied the "expected to reside" requirement for fiscal 1975?

The Secretary originally approved the block grant applications of the appellant Towns and the City of Hartford because HUD had no basis to find, as required by Section 104(c) of the 1974 Act, 42 U.S.C. 5304(c), that the estimate of housing needs was plainly inconsistent with generally available, significant facts and data. Nonetheless, during consideration of applications for fiscal 1975 funds, HUD discovered that the methodology of many applicants for computing the expected to reside ("ETR") figure in the housing assistance plans was unsophisticated and that reliable data for the computation were

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1/ The Court's attention is directed to our brief amicus curiae for the Secretary's construction of the Act, its legislative history, and the evolving regulations of the Secretary which implement it.

not readily available (see our Amicus Br. pp. 13-18). In order to avoid recurrence of this difficulty in future years, HUD amended its regulations at 24 C.F.R. 570.303(c)(2)(i) and (ii) to impose a new ETR methodology upon applicants for block grant funds. See 41 Fed. Reg. 11128 (March 16, 1976). HUD also distributed special tabulations of data which were available for use in the fiscal 1976 applications.

Subsequent to the decision of the district court, the Department incorporated this new methodology for computing ETR into a memorandum which was distributed to the seven defendant communities as part of the instructions for reprocessing the applications for fiscal year 1975. See Memorandum from David O. Meeker, Jr. to Lawrence Thompson dated March 4, 1976, attached as an appendix. 2/ The methodology described in this memorandum is in all significant respects identical to that incorporated into the regulations applicable to fiscal year 1976 applications. The memorandum imposed a deadline for submission of revised applications to HUD by April 15, 1976.

Five of the seven defendant communities submitted block grant re-applications in accordance with these instructions. Those communities are: Enfield, Farmington, Glastonbury, Vernon, and West Hartford. East Hartford and Windsor Locks did not file

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2/ Although this document is not part of the record on appeal, this Court can take judicial notice of public records under Rule 201 of the Federal Rules of Evidence.

revised fiscal 1975 applications. HUD's Hartford Area Office reviewed the applications pursuant to the review criteria set forth in Section 104(c) of the 1974 Act, 42 U.S.C. 5304(c). Based upon this review, HUD has determined that the revised applications received from each of the above five communities should be approved. However, approval letters will not be dispatched to the respective communities without approval of the district court.

A Notice of Compliance with the district court's January 28, 1976, decision was filed on behalf of the Secretary in the district court on March 7, 1977. This notice was accompanied by an affidavit executed by Lawrence Thompson, Director of HUD's Hartford Area Office, copies of all instructions provided the communities for submitting this revised application, and the administrative record supporting HUD's decision to approve the revised application for each of the five communities.

Thus, in response to Question 1, it is the Secretary's position that appellants Glastonbury and West Hartford have satisfied the expected-to-reside requirement for fiscal 1975 in their revised applications. Whether East Hartford satisfied that requirement in its initial application depends upon the correctness of the holding of the district court and the three-judge panel of this Court that the Secretary abused her discretion in approving that application. The Government did not appeal that holding.

2. If so, have the appellant Towns reapplied to the lower court for modification of the decree as set forth at page 1105 of the panel majority opinion?

As of March 15, 1977, none of the three appellant Towns has filed a motion to dissolve the injunction in the district court. Enfield, one of the defendant municipalities that did not appeal, however, moved to dissolve the injunction as to it on March 9, 1977. The district court has not informed HUD that it may dispatch the letters of approval with respect to the applications of any of the defendant Towns.

Since East Hartford did not submit a revised application before the April 15, 1976 deadline, and HUD has not prepared an approval letter indicating compliance with revised program requirements, there would appear to be no basis upon which East Hartford could seek a modification of the decree before the district court.

3. If not, what has happened to the funds in question?

The authority to draw upon accounts at the Department of Treasury for payment of fiscal year 1975 project expenses remains allocated to the seven defendant municipalities. The status of the accounts at the Department of Treasury is as follows:

Town	Total Grant	Amount Paid	Amount Subject to Injunction
East Hartford	$ 440,000	0	$ 440,000
Enfield	1,223,000	$ 54,999.99 3/	1,168,000.01
Farmington	154,000	0	154,000
Glastonbury	910,000	0	910,000
Vernon	25,000	0	25,000
West Hartford	999,000	0	999,000
Windsor Locks	710,000	263,000 3/	447,000

Subsequent to the entry of the preliminary injunction against the defendant municipalities, HUD filed with the Department of Treasury an administrative hold upon the accounts of each municipality for fiscal 1975 funds. That hold will be removed with respect to each municipality for which the outstanding injunction is dissolved.

The funds allocated to the two municipalities which did not submit applications pursuant to the revised procedures will remain allocated to those communities pending disposition of this appeal. If the majority opinion of the panel is affirmed and review by the Supreme Court is not sought or is denied, HUD will take steps to reallocate the funds pursuant to its regulations implementing 42 U.S.C. 5306(e). See 24 C.F.R. 570.409 as amended 41 F.R. 21750 (May 27, 1976). In the event the decision of the district court is reversed, HUD will remove the hold on the accounts at the Department of Treasury without further application by each municipality unless otherwise instructed.

3/ These amounts were drawn pursuant to modification of the preliminary injunction approved by the district court.

III.

ANALYSIS OF STANDING ISSUE

In the court below, the Government argued that none of the plaintiffs has standing to bring this action. Although we did not appeal the district court's contrary holding, the standing issue is presented by the suburbs' appeals, and we believe it appropriate to comment on that issue at least to the extent of suggesting a method of analyzing that issue.

The majority of the three-judge panel, as well as the court below, held that both the City of Hartford and the two individual plaintiffs have standing to maintain this action (slip op. 1091-1099). The dissenting member of the panel stated his view that neither the City nor the individuals have standing (slip op. 1108-1114). We shall discuss each category separately. Our comments are addressed to the injury-in-fact aspect of the standing doctrine, which, of course, is imposed by the case or controversy requirement of Article III. Simon v. Eastern Kentucky Welfare Rights Organization, 426 U.S. 26, 38 (1976); Warth v. Seldin, 422 U.S. 490, 498-499 (1975). [4/]

4/ A plaintiff must also satisfy the prudential limitations of the standing doctrine by showing that his interest is "arguably within the zone of interests to be protected or regulated" by the statute in question. Association of Data Processing Service Organizations v. Camp, 397 U.S. 150, 153 (1970). The panel held that the interests of both categories of plaintiffs are within the zone of interests protected by the 1974 Act (slip op. 1095-1097). The dissent did not take issue with that holding.

1. City of Hartford. The majority of the panel held that the City sustained two types of injuries from the Secretary's approval of the grants to the suburbs that are likely to be redressed by the Court's intervention. First, the panel held that the approval of the grants deprived Hartford of the opportunity to receive part of the money for itself in the reallocation process and that there is a "strong likelihood that Hartford will receive reallocated funds" if it prevails in this action (slip op. 1093). Second, the panel held that the Secretary's improper approval of the grants to the suburbs "lessen[ed] the probability that the towns would use the funds received to" provide housing for low-income persons now residing in Hartford thereby decreasing the City's "welfare and housing subsidy outlays" (slip op. 1094-1095).

A. With respect to the first injury found by the panel, an initial inquiry is whether a party who claims benefits under an agency procedure can challenge its legality. Hartford's own fiscal 1975 grant application included an expected-to-reside figure of zero [5/] and, using the identical procedures that were applied to the suburbs' applications,

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5/ The panel correctly stated that there was testimony in the district court indicating that a zero ETR figure might be appropriate for Hartford (slip op. 1090, n.11). On this point, however, the Court may wish to take judicial notice that the ETR figure submitted in Hartford's fiscal 1976 application is 2,388.

HUD approved a grant of $10,025,000 to the City. Supplemental Affidavit of Lawrence L. Thompson, ¶¶ 50-53 and exhibits thereto, filed September 12, 1975; Tr. 497-498. To allow one who claims benefits under an agency procedure to challenge that procedure is analogous to allowing one who claims benefits under a statute to contest its constitutionality. There is a longstanding doctrine against this latter type of action, although the doctrine has been unevenly applied. Ashwander v. TVA, 297 U.S. 288, 348 (1936) (Brandeis, J., concurring); Fahey v. Mallonee, 332 U.S. 245, 255-256 (1947); Arnett v. Kennedy, 416 U.S. 134, 153 (1974) (plurality opinion).

Assuming Hartford can establish the necessary injury from challenged procedure while still retaining its benefits, the next inquiry is how probable is it that the City will obtain reallocated funds if it prevails in this action. The panel majority found a "strong likelihood" (slip op. 1093), while the dissent found it "sheer fantasy" (slip op. 1110). Simon v. Eastern Kentucky Welfare Rights Organization, supra, 426 U.S. at 38, requires an injury "that is likely to be redressed by a favorable decision" (emphasis added). Warth v. Seldin, supra, 422 U.S. at 504, required facts "from which it reasonably could be inferred that" absent the claimed injury "there is a substantial probability that" plaintiffs would have obtained the desired benefit "and

that, if the court affords the relief requested, the asserted inability of [plaintiffs] will be removed" (emphasis added). If the prospect that the requested relief will have the desired effect is "only speculative," standing is lacking. Linda R. S. v. Richard D., 410 U.S. 614, 618 (1973). Similarly, there is no standing if "[s]peculative inferences are necessary to connect [plaintiffs'] injury to the challenged actions of" the defendants. Simon v. Eastern Kentucky Welfare Rights Organiztion, supra 426 U.S. at 45.

There are several links in the causal chain involved in Hartford's claim that the Secretary's decision reduces grants that the City would otherwise have received upon reallocation. First, will any funds be available for reallocation or will the defendant suburbs obtain their grants by submitting revised applications? As discussed in Point II above, East Hartford and one suburb that did not appeal, Windsor Locks, did not reapply by the April 15, 1976 deadline. This fact indicates that some funds would be available for reallocation if Hartford prevails in this action.

Second, will Hartford apply for funds available for reallocation? The district court noted that a Hartford official advised the court that the City would apply. 408 F. Supp. 879, 885-886.

Third, if Hartford applies, will its application be approved by the Secretary. The standards governing reallocation of funds are set forth in 42 U.S.C. 5306(e) and 24 C.F.R. 570.401(b), 570.409, as amended, 41 Red. Reg. 21750 (May 27, 1976). Under these standards, reallocated funds are used to make grants to eligible applicants that have "urgent needs," as that term of art is defined in 24 C.F.R. 570.401(b). The panel majority concluded that there is no indication that the City will not be able to make the necessary showing (slip op. 1093). In this regard, however, the City inquired about obtaining reallocated fiscal 1976 funds (fiscal 1975 funds are at issue in this case), and HUD advised Hartford that its proposed use of the funds did not meet the urgent needs test and that a "number of previously funded programs throughout the State do meet these criteria * * *" (Addendum, 4a to our Amicus Brief). Thus, the decisive question is whether in these circumstances the majority correctly concluded that Hartford had established a "strong likelihood" that it will receive reallocated funds if the court intervenes (slip op. 1093) or whether that prospect is "only speculative," Linda R. S. v. Richard D., supra, 410 U.S. at 618, as the dissent concluded (slip op. 1110).

B. The second injury to Hartford found by the majority of the panel was that the Secretary's approval of the suburbs' applications "substantially lessen[ed] the probability that the towns would use the funds received to promote spatial

deconcentration" by inducing some of Hartford's low-income residents to move to the suburbs (slip op. 1094-1095). Perhaps the most debatable link in the casual chain implicit in this finding is whether higher ETR figures in the suburbs' first-year applications would have led to more low-income housing opportunities in the suburbs. As the majority noted (slip op. 1084), the community development funds involved cannot be used for the construction of housing or the payment of housing allowances. Title II of the 1974 Act, however, establishes the Section 8 housing subsidy program, 42 U.S.C. 1437f, but the housing assistance plans of the seven defendant suburbs fully ulitized all available Section 8 funding (see our Amicus Br. p. 11).

Apart from that question, the panel's decision appears to rest upon an implied holding that the presence of a substantial number of low-income persons in Hartford is a legally cognizable injury. It is true that an important objective of the 1974 Act is "the spatial deconcentration of housing opportunities for persons of lower income * * *." 42 U.S.C. 5301(c)(6). It does not necessarily follow, however, that concentrations of low-income people constitute a legal injury. Cf., Nucleus of Chicago Homeowners Association v. Lynn, 524 F. 2d 225 (C.A. 7, 1975), certiorari denied, 424 U.S. 967 (1976). Hartford's participation in the community development program suggests that the City would prefer to

improve the economic condition of its residents rather than to reduce its low-income population through migration (But cf., Complaint ¶¶ 35-55).[6/] In the end, it may be that Hartford has brought this action not because it believes it is being injured by its low-income citizens, but rather because it wishes that its suburbs would make more of an affirmative commitment to assist disadvantaged persons generally. Although both laudable and consistent with the 1974 Act, that wish cannot take the place of a concrete injury for purposes of Article III jurisdiction.

2. Individual Plaintiffs. With respect to the standing of the two low-income individual plaintiffs, the method of analysis is controlled by Warth v. Seldin, supra; Village of Arlington Heights v. Metropolitan Housing Development Corp., 45 U.S.L.W. 4073, 4077 (January 11, 1977); and Evans v. Hills, 537 F. 2d 571 (C.A. 2, 1976) (en banc), certiorari denied, 45 U.S.L.W. 3489 (January 17, 1977). Several facts should be noted with respect to their standing.

6/ Indeed, its second-year ETR figure of 2,388 suggests that the City intends to provide for even more economically disadvantaged persons.

First, plaintiff Miriam Jordan alleges that she "is currently attempting to secure decent low-cost housing" (Complaint ¶ 5), and her supporting affidavit indicates that she has sought housing in East Hartford and West Hartford, but not Glastonbury. Affidavit of Miriam Jordan, filed August 11, 1975. She does not relate her housing needs to any particular housing project in any of the seven suburbs. Fannie Mauldin states that she has "actively sought low income or subsidized housing" in four municipalities "these past several months," but she does not state that she has ever sought or is seeking housing in any of the seven defendant suburbs. Affidavit of Fannie Mauldin, filed August 11, 1975; See also, Complaint ¶ 6. In these circumstances, the interests of the two individual plaintiffs appear more similar to those of the low-income plaintiffs in Warth and Evans, where standing was found lacking, than to the individual plaintiff in Arlington Heights, whose standing was upheld because his quest for housing "focuse[d] on a particular project and [was] not dependent upon speculation about the possible actions of third parties not before the court." 45 U.S.L.W. at 4077.

Second, as discussed above, the housing assistance plans of the seven defendant suburbs made maximum use of available Section 8 subsidies. Even if the suburbs revise their ETR figures upward, therefore, there is at least a serious question as to whether additional low-income housing would become available (But cf., slip op. 1098-1099).

Finally, in seeking in forma pauperis status, plaintiffs Jordan and Mauldin stated that the sole source of income for themselves and their families was welfare assistance and food stamps. Financial Affidavit of Miriam Jordan, filed August 11, 1975; Financial Affidavit of Fannie Mauldin, filed August 11, 1975. Because they are not employed in any of the seven suburbs and there is no showing that they expect to work there, they would not be included in the suburbs' ETR figures. 24 C.F.R. 570.303(c)(i); See also, H. R. Rep. No. 93-1114, 93rd Cong., 2nd Sess. 7 (1974) (quoted in our Amicus Br. p. 14). To the extent the order below might lead the suburbs to revise their ETR figures upward, and then to revise their programs in light of the higher figures, neither individual plaintiff would appear to be within the benefited class of persons expected to reside in the suburbs.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of March, 1977, I served the foregoing brief upon counsel for all other parties, by mailing copies, postage prepaid, to:

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ADDENDUM

HUD-28 (4-72) PREVIOUS EDITION MAY BE USED

Memorandum

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

TO : Larry Thompson, Area Director
Hartford Area Office, 1.2G

DATE: March 4, 1976

IN REPLY REFER TO:

FROM : David O. Meeker, Jr., Assistant Secretary for CPD

SUBJECT: Procedures for Reprocessing of First Year Block Grant Applications Pursuant to Memorandum of Decision and Order dated January 28, 1976 in City of Hartford v. Hills, Civil Action No. H-75-258

This memorandum sets forth the procedures developed by my office in consultation with the Office of General Counsel and your office to reprocess the first year block grant applications of any of the seven defendant communities desiring to resubmit its application for reprocessing pursuant to the Memorandum of Decision and Order of January 28, 1976. Copies should be provided to each of the seven applicants, and to any interested members of the public, including the City of Hartford.

The Memorandum of Decision and Order enjoined the seven defendant Towns from drawing or spending in any fashion the entitlement funds granted to them under their first year block grant applications and as stated at page 41:

> "The Towns may seek to obtain a new approval of these block grant applications as ordered. This injunction may be lifted upon the filing with the court of the new approval."

The Order entitles each defendant community ("Applicant"), if it wishes, to resubmit its application for reprocessing. Since only the expected to reside information in the Housing Assistance Plan of each Applicant was found by the Court to be improperly submitted and approved, only that portion of each application is required to be revised.

Because the block grant program as implemented does not contemplate any reprocessing of an application subsequent to the approval of the application, the Department does not have existing rules and regulations governing such reprocessing. Accordingly, this memorandum was prepared to establish the rules and procedures which should be followed in preparing a resubmission pursuant to the Order of the Court.

Resubmission of Assessment of Housing Assistance Needs of Lower-Income Households

Each Applicant desiring to reprocess its first year block grant application is required to revise and resubmit Section C (Additional Families Expected to Reside in Community) of Table II, Housing Assistance Needs of Lower-Income Households of its Housing Assistance Plan, on the attached form. The Applicant is required to complete the breakdown in Section C between "1. As a Result of Planned Employment" and "2. Already Employed in the Locality."

3.

If the Applicant revises any other information in the Housing Assistance Plan, the Applicant should seek guidance from the Area Office as to the form of submission.

Assessment of Additional Families Expected to Reside in Community.

The Applicant must assess the housing assistance needs of lower income families (those whose income does not exceed 80% of the median income for the area) expected to reside in the community. All data sources for the estimates must be listed and all calculations used to derive the estimates must be set forth. The Applicant's assessment must be the sum of the following two components:

1. Lower-Income Families Expected to Reside in Community as a Result of Planned Employment. The Applicant must assess the housing assistance needs of lower income families expected to reside in the community in the next three years as a result of known commercial, industrial, governmental, or other employment expected to be generated by new or expanded development. Sources of information to derive these estimates may include approved development plans, building permits, and awards of significant contracts.

4.

When the Department reviews this assessment to determine whether or not "on the basis of significant facts and data, generally available and pertaining to community and housing needs and objectives," the assessment is "plainly inconsistent with such facts and data," the Department will consider the assessment not to be plainly inconsistent with such generally available facts and data calculated in accordance with the following methodology: The Applicant should estimate the number of new jobs for lower-income workers to be created in the next three years based upon data generally available, and then estimate the number of such new jobs for lower-income workers in the community which are expected to be filled by workers already living in the Applicant community. The difference will equal the number of workers expected to commute into the Applicant community. This "number of workers" would be used to estimate the corresponding number of families. The proportion of such number of lower-income families anticipated to have workers commuting in the community who can be expected to reside in the community will be computed in the same way as the proportion for workers already living in the community (see paragraphs "third" and "fourth" on pages 7-8). This final calculation produces the estimate to be entered on Line C.1.

2. <u>Lower-Income Families with Workers Already Employed in the Community, but Living Elsewhere, Expected to Reside in the Community.</u> The Applicant should assess the housing

assistance needs of lower-income families with workers already employed in the community, but living elsewhere, who could reasonably be expected to reside in the community.

In computing its assessment, the Applicant should use Federal census data and should consider any information relevant to the expected to reside assessment in any more recent (1970 or later) housing needs assessment prepared by an areawide, regional, or State planning agency. In addition, the Applicant may consider other relevant data generally available.

Based upon data generally available, the Applicant should estimate the number of lower-income workers commuting to work in the Applicant community but living elsewhere. The Applicant should then estimate, based upon generally available data, what percentage of this number would be expected to reside in the Applicant community if housing such lower-income workers could afford were available.

For the Hartford SMSA, published Federal census data which are relevant to the assessment of families with workers employed in the community but not living there who may be expected to reside in the community include the Journey to Work (PC (2)-6D) and the 1970 Census of Population.

Tabulations for the Hartford SMSA of workers who commute, based on 1970 Census Journey to Work data, are available through the Department of Transportation. Special tabulations of 1970 census information factors which can be used to derive the number of lower-income families from wage earner distribution, are available from HUD. Although data from these sources can be used to estimate the number of lower-income families which have workers who commute into the Applicant community, HUD recognizes that these may be rough estimates in view of serious deficiencies in the available data. However, until better data becomes available, such data as are available must be used.

In estimating the percentage of lower-income workers commuting into the Applicant community to work who would, if housing they could afford were available, move to the Applicant community, it is reasonable to estimate that less than all such families would opt to move into the Applicant community.

The following methodology has been determined by the Department to be one which, if properly applied, would yield a result which the Department would not determine to be "plainly inconsistent" with generally available facts and data.

First, the Applicant should estimate the number of lower-income families with workers commuting into the community from residences outside the community, as discussed above.

Second, the Applicant should similarly estimate how many lower-income families it has resident in the community which have workers employed in the community. The sum of these two figures would be the estimated total number of lower-income families having workers employed in the community.

Third, the Applicant should determine an overall SMSA percentage of lower-income families having workers who live in the same community in which they work, for such communities of the SMSA for which data are available (the "SMSA percentage").

Fourth, the Applicant should then multiply the SMSA percentage by the following percentage: the Applicant's lower-income families having workers employed in the community who do not live in the community, divided by the Applicant's total lower-income families having workers employed in the community (both resident families and families who reside elsewhere). This adjustment will take into account the extent to which lower-income families with workers reside in the community by producing a higher expected to reside

estimate for otherwise equally situated communities which have a lesser percentage of their lower-income workers already residing in the community.

The resulting percentage should be applied to the estimated number of lower-income families not living in the Applicant community but having workers commuting to work in the community. This final calculation produces the total estimated, to be entered on line C.2., of lower-income families with workers employed in the Applicant community who can be expected to reside there.*

A-95 and Citizen Participation.

In the event that the Applicant's revised submission consists only of a revised Table II to the Housing Assistance Plan, no citizen participation or A-95 review requirements apply.

*If the community's estimated percentage of all resident families (whether or not they have workers) which are lower-income is higher than the SMSA percentage of all resident families (whether or not they have workers) which are lower-income, the resulting expected to reside assessment may be reduced by a percentage equal to the difference. For instance, if the SMSA percentage is 40% but the Applicant estimates that 50% of all the Applicant families, including those with workers and those without, are lower-income, the Applicant may reduce the assessment of the number of lower-income families expected to reside by 10% (50% less 40%).

9.

To the extent any of the other parts of the application are revised, the Applicant should determine under Regulation Section 570.305 whether citizen participation or A-95 is required; if guidance is needed, the Area Office should be consulted.

Deadline for Resubmission

Any Applicant desiring to resubmit must do so not later than April 15, 1976. The Area Office should promptly review any resubmissions. The 75-day review provision of Regulation Section 570.306(c) does not apply to such resubmissions.

SECTION C OF TABLE II - HOUSING ASSISTANCE NEEDS OF LOWER INCOME HOUSEHOLDS

	TOTAL			
	Total	Large Families	Elderly and Handicapped	Other
C. Additional Families Expected to Reside in the Locality (Sum C.1. and C.2.)				
1. As a result of planned employment				
2. Already employed in locality				